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Dominance MMA, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KAJAN JOHNSON, CLARENCE
DOLLAWAY, and TRISTAN CONNELLY, on
behalf of themselves and all others similarly
situated;

Plaintiff,

vs.

ZUFFA, LLC, TKO OPERATING COMPANY,
LLC f/k/a Zuffa Parent, LLC (d/b/a Ultimate
Fighting Championship and UFC), and
ENDEAVOR HOLDINGS, INC.,

Defendants.

CASE NO. 2:21-cv-01189-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
NONPARTY DOMINANCE MMA,
LLC TO RESPOND TO MOTION TO
COMPEL [ECF No. 216]**

(First Request)

Plaintiffs, Kajan Johnson, Clarence Dollaway and Tristan Connelly (“Plaintiffs”), and Nonparty, Dominance MMA, LLC (“Dominance”), by and through their undersigned counsel of record, hereby stipulate as follows:

1. Plaintiffs filed a motion to compel against Nonparty Dominance (ECF No. 216), with a current deadline for response set for August 6, 2025.
2. The parties have conferred and agreed to a one-week extension of time for Dominance to file its response to the motion to compel.
3. Accordingly, the deadline for Dominance to respond to the motion shall be extended from August 6, 2025, to August 13, 2025.



1 4. Good cause exists for this extension because Counsel for Dominance requires
2 additional time to prepare a complete and accurate response due to (i) the volume of the issues
3 raised in the motion, (ii) the need to coordinate with Dominance, which is not a litigant in the
4 underlying case, and (iii) previously scheduled obligations and deadlines in other matters. The
5 requested extension will allow for more efficient resolution of the issues and may facilitate
6 narrowing the dispute.

7 5. This is the first request to extend Dominance's response deadline.

8 6. The requested extension is made in good faith and not for the purpose of delay.

9 Dated this 1st day of August, 2025.

10 Respectfully Submitted By:
11 CHRISTIANSEN TRIAL LAWYERS

Approved as to Form and Content:
JOSEPH SAVERI LAW FIRM, LLP

12 /s/ Keely P. Chippoletti

/s/ Kevin E. Rayhill

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20 **ORDER**

21 The Court, having reviewed the parties' stipulation and good cause appearing, hereby
22 ORDERS that deadline for Nonparty Dominance MMA, LLC to file a response to Plaintiffs'
23 motion to compel (ECF No. 216) shall be extended to August 13, 2025.

24 IT IS SO ORDERED.

25 
26 _____
27 RICHARD F. BOULWARE, II
28 UNITED STATES DISTRICT JUDGE

DATED: This 1st day of August, 2025.

